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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Roseanna A. Sias,  
Eileen L. McMenamin,  
Basilia Tsikentzoglou,  
Paul Testa, and  
John C. Wong

Plaintiffs,

v.

NEW JERSEY SECRETARY OF  
STATE  
Tahesha Way, in her official capacity as  
Lt. Governor and Secretary of State the  
State of New Jersey;  
NEW JERSEY DIVISION OF  
ELECTIONS;  
Donna Barber, in her official capacity  
as Acting Director for the New Jersey  
Division of Elections

Defendants.

**Civil Action**

Hon. Michael A. Shipp, U.S.D.J.  
Civ. Action No.  
3:24-CV-08747-MAS-RLS

**NOTICE OF CROSS-MOTION TO  
DISMISS**

PLEASE TAKE NOTICE that on October 7, 2024, the undersigned Matthew J. Platkin, Attorney General of New Jersey, by Levi Klinger-Christiansen, Deputy Attorney General, on behalf of defendants Tahesha Way, in her official capacity as Lt. Governor and Secretary of State of New Jersey, and Donna Barber, in her official capacity as Acting Director of the New Jersey Division of Elections, shall cross-move before the Honorable Michael A. Shipp, U.S.D.J., in the United States District Court for the District of New Jersey, for an Order dismissing the Complaint filed by Plaintiffs, pursuant to Fed. R. Civ. P. 12(b)(6).

PLEASE TAKE NOTICE that the undersigned shall rely on the attached brief and exhibits in support of the motion to dismiss in lieu of answer.

A proposed form of Order is attached hereto.

Respectfully submitted,

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: /s/ Levi Klinger-Christiansen  
Levi Klinger-Christiansen  
Deputy Attorney General

Dated: September 9, 2024